



STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF  
STATE PLANNING COORDINATION

October 15, 2004

Mr. Garth E. Jones  
Becker Morgan Group, Inc.  
738 South Governors Avenue  
Dover, DE 19904

RE: PLUS review – PLUS # 2004-09-05; Heritage Building Group, Inc/Webb Property

Dear Mr. Jones

Thank you for meeting with State agency planners on September 22, 2004 to discuss the proposed plans for Webb Property project located on Buffalo Road near Frederica. According to the information received, you are seeking a site plan review for 205 residential lots on 88 acres. The remaining 10 acres would be an out parcel with unspecified uses.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as Kent County is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the County.

This office has received the following comments from State agencies:

**Office of State Planning Coordination – Contact: David Edgell 739-3090**

This project is located in Investment Level 3 according to the 2004 State Strategies for Policies and Spending. This site is also located in the Kent County Growth Zone. Investment Level 3 reflects areas where growth is anticipated by local, county, and state plans in the longer term future, or areas that may have environmental or other constraints to development. State investments will support growth in these areas, but please be advised that the State may have other priorities in the near term future. Our office has no

objections to the proposed development of this project in accordance with the County codes and ordinances.

**State Historic Preservation Office (SHPO) – Contact: Anne McCleave 739-5685**

There is an existing house and outbuildings located on the out parcel, which will be surrounded by the proposed development. It is suggested that the development include landscaping along the borders of this out parcel to help lessen the visual effects the development will cause to the property. There is a known archaeological site located on the west side of the subject property with a high probability that other sites exist throughout the subject area. We encourage the applicant and developer to contact the SHPO at 302-739-5685 to schedule a time their archaeologists can visit the site and advise on the best ways to design the development so that it does not harm the archeological sites.

**Department of Transportation – Contact: Bill Brockenbrough 760-2109**

- 1) Both Barratts Chapel Road and Buffalo Road are classified as local roads and have an existing right-of-way width of 50 feet. DelDOT's policy is to require dedication of sufficient land to provide a minimum right-of-way width of 30 feet from the centerline on local roads. Therefore DelDOT will require right-of-way dedication to provide an additional 5 feet on both roads from this project.
- 2) The developer will be required to improve both Barratts Chapel Road and Buffalo Road to meet DelDOT's standard typical section for local roads (two 11-foot lanes and two 5-foot shoulders) for the length of the site frontage.
- 3) DelDOT will also require that a multi-modal path, located in a 15-foot wide permanent easement, be provided across the frontage of the site on both roads.
- 4) The developer will be required to realign Buffalo Road at Barratts Chapel Road to form a right-angle intersection.
- 5) There are two outparcels, one fronting on Barratts Chapel Road and surrounded by the proposed development on the other three sides, and one on Buffalo Road at the north end of the development's frontage. Street connections should be provided to both of them.
- 6) The developer should be aware that as part of our Corridor Preservation Program DelDOT will eliminate all movements at the intersection of Delaware Route 1 and Barratts Chapel Road except the right turn out. This would be done as part of a contract for a grade-separated interchange that is scheduled for advertisement in the fall of 2007. A service road parallel to Route 1 would provide access to and from the north. This change in access may result in more of the site traffic using Buffalo Road. For that reason, DelDOT may require the developer, as part of

their entrance improvements, to improve Buffalo Road beyond the realignment mentioned above.

- 7) The developer's engineer should contact the DelDOT project manager for Kent County, Mr. Brad Herb of Johnson, Mirmiran & Thompson, regarding the Buffalo Road improvements mentioned in items 1 and 2 above and our requirements for access. Mr. Herb may be reached at (302) 266-9080.

**The Department of Natural Resources and Environmental Control – Contact: Kevin Coyle 739-3091**

### **Soils**

Kent County soil survey mapping indicates that Sassafras, Woodstown, Fallsington, and Johnston were mapped in the immediate vicinity of the proposed construction. Sassafras is a well-drained upland soil that has few limitations for development. Woodstown is a moderately well-drained soil of low-lying uplands that has moderate limitations for development. Fallsington is a poorly-drained wetland associated (**hydric**) soil that has severe limitations for development. Johnston is a very poorly-drained (**hydric**) soil associated with floodplain wetlands.

### **Wetlands**

Statewide Wetland Mapping Project (SWMP) maps indicate the presence of Palustrine Forested and Palustrine scrub shrub wetlands. Site plans show that there will not be direct impacts to these wetlands through construction activities; however, secondary impacts of construction could be detrimental to the health of these wetlands and their associated streams. To mitigate these impacts DNREC recommends a vegetated buffer of no less than 100' from the edge of wetlands and waterbodies. Because this property is located within a State Resource Area and within the Murderkill watershed where water quality is degraded, preserving as much of the existing forested area as a buffer is particularly important. Lot lines should exclude all wetlands and buffer zones to ensure against potential cumulative impacts resulting from unauthorized and/or illegal activities and disturbances that can be caused by homeowners.

It is also recommended that the Farm Services Agency of the USDA be contacted to assess whether the farmed wetlands on subject parcel meet the recognized criteria for classification as "prior converted wetlands." Prior converted wetlands are farmed wetlands that have drained or altered before December 23, 1985, and no longer meet the wetland criteria established under the 404 program. Such wetlands are considered exempt from regulatory protection provided that there is no proof of a continuous "fallow period" of five years or greater in that parcel's cropping history. Parcels converted after said date regardless of cropping history are considered jurisdictional by the Army Corps of Engineers (ACOE). The contact person for assessing a parcel's cropping history is Sally Griffin at the USDA – she can be reached at 678-4182.

It should also be noted that this parcel immediately borders sensitive headwater or near headwater riparian wetlands associated with Double Run Creek. Headwater streams and their associated wetlands are important for the protection of water quality and the maintenance/integrity of the ecological functions throughout the length of the stream, including the floodplain system downstream. Since such streams are a major avenue for nutrient-laden stormwater and sediment runoff, their protection deserves the highest priority.

**In recognition of this concern, the Department strongly recommends that the applicant preserve the existing natural forested buffer (both wetlands and uplands) adjacent to the Double Run Creek in its entirety. Efforts to maximize or expand the existing natural forested buffer width via planting of native woody or herbaceous vegetation, is further recommended.**

### **TMDLs**

With the adoption of Total Maximum Daily Loads (TMDLs) as a “nutrient-runoff-mitigation strategy” for reducing nutrients in the Inland Bays Watershed, reduction of nitrogen and phosphorus loading will be mandatory. A TMDL is the maximum level of pollution allowed for a given pollutant below which a “water quality limited water body” can assimilate and still meet water quality standards to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. Although TMDLs are authorized under federal code, states are charged with developing and implementing standards to support those desired use goals. The Jurisdictional authority for attaining these use goals will fall under the auspices of Section 11.5 of the State of Delaware’s Surface Water Quality Standards (as amended August 11, 1999), and will be achieved via nutrient reductions referred to as “pollution control strategies.”

Nutrient reductions prescribed under TMDLs are assigned to those watersheds or subwatersheds on the basis of recognized water quality impairments. In the Murderkill, the primary source of water quality impairment is associated with nutrient runoff from agricultural and/or residential development. In order to mitigate the aforementioned impairments, a TMDL reduction level of 30 and 50 percent will be required for nitrogen and phosphorus, respectively.

**In order for the applicant to verify compliance with the TMDL mandate, a full nutrient accounting process known as nutrient budget should be prepared. The developer/consultant should contact Lyle Jones (739-4590) in the Department’s Watershed Assessment Section for further information regarding the acceptable protocol for calculating a nutrient budget.**

The developer is encouraged to employ BMPs (or other pollution control strategies) such as stormwater management and riparian buffers to mitigate any potential nutrient runoff into an adjoining streams or watercourse.

Although Total Maximum Daily Loads (TMDLs) as a “pollution runoff mitigation strategy” to reduce nutrient loading have not yet been developed for most of the tributaries or subwatersheds of the Delaware Bay watershed to date, work is continuing on their development. TMDLs for the Murderkill River subwatershed, of which this parcel is part, are scheduled for completion in December 2006.

Therefore, until the specified TMDL reductions and pollution control strategies are adopted, it shall be incumbent upon the developer to employ best available technologies (BATs) and/or best management practices (BMPs) as “methodological mitigative strategies” to reduce degradative impacts associated with development.

### **Water Supply**

Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation.

All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-3665.

### **Stormwater Management**

1. Land disturbing activities in excess of 5,000 square feet are regulated under the Delaware Sediment and Stormwater Regulations. A detailed sediment and stormwater management plan must be reviewed and approved by the Kent Conservation District prior to any land disturbing activity (i.e. clearing, grubbing, filling, grading, etc.) taking place. The review fee and a completed Application for a Detailed Plan are due at the time of plan submittal to the Kent Conservation District. Construction inspection fees based on developed area and stormwater facility maintenance inspection fees based on the number of stormwater facilities are due prior to the start of construction. Please refer to the fee schedule for those amounts.

2. The following notes must appear on the record plan:

- The Kent Conservation District reserves the right to enter private property for purposes of periodic site inspection.
  - The Kent Conservation District reserves the right to add, modify, or delete any erosion or sediment control measure, as it deems necessary.
  - A clear statement of defined maintenance responsibility for stormwater management facilities must be provided on the Record Plan.
3. Ease of maintenance must be considered as a site design component and a maintenance set aside area for disposal of sediments removed from the basins during the course of regular maintenance must be shown on the Record Plan for the subdivision.
4. All drainage ways and storm drains should be contained within drainage easements and clearly shown on the plan to be recorded by Kent County.
5. A soils investigation supporting the stormwater management facility design is required to determine impacts of the seasonal high groundwater level and soils for any basin design.
6. From the USGS Topography Map, it appears that steep erodeable slopes are present around the perimeter of the site bordering the Double Run. Care should be taken to avoid disturbance in these areas.
7. This site may be eligible for a waiver of stormwater quantity management based on a tidal discharge. The site would still be required to meet stormwater quality management requirements.
8. The preferred methods of stormwater management are those practices that maximize the use of the natural features of a site, promote recharge and minimize the reliance on structural components. The designer is encouraged to consider the conservation design approach and limit the amount of tree clearing required for the development of the site including the stormwater management facilities shown in the wooded areas.
9. Access to the proposed stormwater facility must be provided for periodic maintenance. This access should be at least 12 feet wide leading to the facility and around the facility's perimeter.
10. It is recommended that the stormwater management areas be incorporated into the overall landscape plan to enhance water quality and to make the stormwater facility an attractive community amenity.
11. A letter of no objection to recordation will be provided once the detailed Sediment and Stormwater Management plan has been approved.
12. Proper drainage of developed lots and active open space should be considered in the development of the grading plan for this subdivision.

13. Based on the site characteristics, a pre-application meeting is suggested to discuss stormwater management and drainage for this site.

### **Drainage**

The Drainage Section is aware of an existing drainage concern on the property to the west of this project. The Drainage Section recommends that the existing ditches and streams on this property be evaluated for function and if needed cleaned with minimal impact to the wooded floodplain prior to selling of lots. The Drainage Section requests that any area designated as a drainage/utility easement be open space and not owned by the individual landowners. Structures, decks, buildings, sheds, kennels, fences, or trees should not be placed within the drainage easement to allow for maintenance. The Drainage Section further requests that all precautions be taken to ensure the project does not hinder any off site drainage upstream of the project or create any off site drainage problems downstream by the release of on site storm water.

### **Floodplains**

Kent County's Subdivision regulations prohibit the subdividing of land within the floodplain. This project appears to encroach within the floodplain. **FEMA requires a detailed flood study to be performed by the applicant if the development proposal is greater than 5 acres or 50 lots, and the floodplain has not been studied in detail by FEMA.**

### **State Resource Areas/Natural Areas**

This project contains land currently identified as part of a State Resource Area. State Resource Areas are comprised of lands that contain a variety of natural, cultural and open space resources significant to the state. Consideration should be given to protecting the riparian forest buffer along Double Run Creek during design and construction of this project. Protection can be accomplished by keeping the lot lines out of the riparian buffer and using less invasive means of managing stormwater runoff than destroying forest to build storm water ponds. For more information, please contact Ron Vickers, Land Protection Office, 739-3423.

This project contains land currently listed on Delaware's Natural Areas Inventory. Natural Areas contain lands of statewide significance identified by the Natural Area Advisory Council as the highest quality and most important natural lands remaining in Delaware. Consideration should be given to protecting these resources within the Murderkill River Natural Area during design and construction of this project. The developer should investigate dedicating the Natural Area as a Nature Preserve through a conservation easement or donation of land. For more information, please contact the Office of Nature Preserves at 739-3423.

## **Forests**

Site plans show significant forest impacts resulting from installation of stormwater management ponds. These ponds should be removed from forested areas and the developer should strongly consider utilizing the forested area for stormwater best management practices that will minimize the need for ponds.

Open space containing forest and/or wetlands should be placed into a permanent conservation easement or other permanent protection mechanism. Conservation areas should also be demarked to avoid infringement by homeowners.

## **Habitat**

On July 19, 2004 DNREC sent comments regarding this project to David Coyne of Liberty Environmental, Inc. The following comments are (in part) those included in the letter:

A review of our database indicates that there are currently no records of state-rare or federally listed plants, animals or natural communities at or adjacent to this project site.

However, the tributary on the western and northern boundaries of the project parcel are within the Murderkill River State Natural Area. If you require further information about this area for your planning project, please contact Rob Line, Natural Areas Program Manager, at (302) 739-3423.

We recommend maintaining the forested buffer along these tributaries (at least 100ft where it exists and preferably 300ft). Buffers are an integral component of aquatic and wetland habitats, reducing the amount of sediments, pollutants, and other non-point source material that may affect the function and integrity of habitat and the condition and survivability of aquatic organisms, including those organisms located downstream of this site within Silver Lake. Forested buffers also serve as habitat for many terrestrial species that are dependent on aquatic and wetlands habitats for a portion of their annual life cycle.

## **Recreation**

It is recommended that sidewalks be built fronting every residence and stub streets. A complete system of sidewalks will: 1) fulfill the recreation need for walking and biking facilities 2) provide opportunities for neighbors to interact in the community and 3) facilitate safe, convenient off-road access to neighboring communities, public mass transit stops, schools, stores, work, etc.

It is further recommended that:

1. the cul-de-sac in the center of the design be changed to a through road,



2. another access road be added along Barrett's Chapel Road, and
3. a stub street be included to access the 10 acre out parcel on the East side of the development. These recommendations will improve mobility for walkers and bikers within and beyond the development.

The Division of Parks and Recreation conducted a telephone survey of Delaware residents to gather information on outdoor recreation patterns and preferences as well as other information on their landscape perception. These findings are the foundation of the 2003-2008 Statewide Comprehensive Outdoor Recreation Plan (SCORP) providing guidance for investments in needed outdoor recreation facilities. The high and moderate facility needs in Kent County are listed below. Consideration should be given to incorporate some of these recreation opportunities into the project. For additional information about the outdoor recreation priorities, contact Bob Ehemann at 739-5285.

High priorities are Walking or Jogging Paths, Bike Paths, Swimming Pools, Picnic Areas, Playgrounds and Fishing Areas.

Moderate priorities are Skate Facilities, Hiking Trails, Baseball/Softball Fields, Campgrounds, Soccer Fields, Volleyball Courts, Basketball Courts and Canoe/Kayak Access.

### **Air Quality**

Air pollution threatens the health of human beings and other living things on our planet. While often invisible, pollutants in the air create smog and acid rain, cause cancer or other serious health effects, diminish the protective ozone layer in the upper atmosphere, and contribute to the potential for world climate change. Breathing polluted air can have numerous effects on human health, including respiratory problems, hospitalization for heart or lung disease, and even premature death. Some can also have effects on aquatic life, vegetation, and animals.

Once complete, vehicle emissions associated with this project are estimated to be 15.7 tons (31,465.4 pounds) per year of VOC (volatile organic compounds), 13.0 tons (26,051.2 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 9.6 tons (19,221.0 pounds) per year of SO<sub>2</sub> (sulfur dioxide), 0.9 ton (1,711.0 pounds) per year of fine particulates and 1,316.0 tons (2,632,037.3 pounds) per year of CO<sub>2</sub> (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 2.5 tons (5,030.0 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 8.7 tons (17,495.5 pounds) per year of SO<sub>2</sub> (sulfur dioxide) and 1,290.3 tons (2,580,589.2 pounds) per year of CO<sub>2</sub> (carbon dioxide).

Emissions from area sources associated with this project are estimated to be 6.3 tons (12,691.4 pounds) per year of VOC (volatile organic compounds), 0.7 ton (1,396.4

pounds) per year of NO<sub>x</sub> (nitrogen oxides), 0.6 ton (1,158.8 pounds) per year of SO<sub>2</sub> (sulfur dioxide), 0.7 ton (1,495.4 pounds) per year of fine particulates and 25.7 tons (51,448.1 pounds) per year of CO<sub>2</sub> (carbon dioxide).

The Department of Natural Resources and Environmental Control is asking that local jurisdictions consider mitigation to help resolve this issue. Mitigation might involve limiting large new developments to growth zones, focusing development to urban areas capable of providing mass transit services, requiring more energy efficient homes which would lessen air quality impacts, and promoting walkability and bikability within and between developments and town centers.

**State Fire Marshal's Office – Contact: Kevin McSweeney 739-4394**

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal's Office. At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

a. **Fire Protection Water Requirements:**

- Where a water distribution system is proposed for single family dwellings it shall be capable of delivering at least 500 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 1000 feet spacing on centers are required.
- The infrastructure for fire protection water shall be provided, including the size of water mains.

b. **Accessibility:**

- All premises which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from Barretts Chapel Rd must be constructed so fire department apparatus may negotiate it.
- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.
- If the use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.

**c. Gas Piping and System Information:**

- Provide type of fuel proposed, and show locations of bulk containers on plan.

**d. Required Notes:**

- Provide a note on the final plans submitted for review to read “ All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations”
- Name of Water Supplier
- Proposed Use
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- Provide Road Names, even for County Roads

Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: [www.delawarestatefiremarshal.com](http://www.delawarestatefiremarshal.com), technical services link, plan review, applications or brochures.

**Department of Agriculture - Contact: Mark Davis 739-4811**

The site is bordered on the north by the 314 acre permanently preserved Gallo Agricultural Preservation District. (see map attached)

Due to it's proximity to an agricultural preservation district, DDA is not in favor of this subdivision. Kent County formed their growth area designation and hence affected the boundaries of the state's investment levels map after the formation of this district. If development plans for this parcel move forward, then the developer and owner should be aware of both the 300 foot notification zone and the 50 foot setback requirements.

If a proposed new subdivision borders or is near an agricultural preservation district, then the owner of the preservation district is entitled to the following use protections, quoted from the Delaware Code:

**§ 910. Agricultural use protections.**

(a) Normal agricultural uses and activities conducted in a lawful manner are preferred and priority uses and activities in Agricultural Preservation Districts. In order to establish and maintain a preference and priority for such normal agricultural uses and activities and avert and negate complaints arising from normal noise, dust, manure and other odors, the use of agricultural chemicals and nighttime farm operations, land use adjacent to Agricultural Preservation Districts shall be subject to the following restrictions:

(1) For any new subdivision development located in whole or in part within 300 feet of the boundary of an Agricultural Preservation District, the

owner of the development shall provide in the deed restrictions and any leases or agreements of sale for any residential lot or dwelling unit the following notice:

*"This property is located in the vicinity of an established Agricultural Preservation District in which normal agricultural uses and activities have been afforded the highest priority use status. It can be anticipated that such agricultural uses and activities may now or in the future involve noise, dust, manure and other odors, the use of agricultural chemicals and nighttime farm operations. The use and enjoyment of this property is expressly conditioned on acceptance of any annoyance or inconvenience which may result from such normal agricultural uses and activities."*

(2) For any new subdivision development located in whole or in part within 50 feet of the boundary of an Agricultural Preservation District, no improvement requiring an occupancy approval shall be constructed within 50 feet of the boundary of the Agricultural Preservation District.

(b) Normal agricultural uses and activities conducted in accordance with good husbandry and best management practices in Agricultural Preservation Districts shall be deemed protected actions and not subject to any claim or complaint of nuisance, including any such claims under any existing or future county or municipal code or ordinance. In the event a formal complaint alleging nuisance related to normal agricultural uses and activities is filed against an owner of lands located in an Agricultural Preservation District, such owner, upon prevailing in any such action, shall be entitled to recover reasonably incurred costs and expenses related to the defense of any such action, including reasonable attorney's fees. (68 Del. Laws, c. 118, § 2.)

A forested buffer is required between the proposed buildings and all adjacent properties in active agricultural use. In addition, a forest buffer should be maintained for those pre-existing residential properties and along all streams, wetlands, and river that border the proposed buildings.

The developer should consider a diverse landscape plan that uses Delaware native tree and shrub species and encourages the "Right Tree for the Right Place" concept.

**Public Service Commission - Contact: Andrea Maucher 739-4247**

The PSC verified that the project is in a certificated area for Artesian Water Company, Inc.

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines. Contact: Malak Michael at (302) 739-4247.

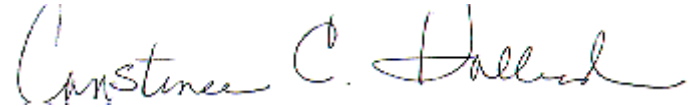
**Delaware Emergency Management Agency - Contact Don Knox 659-3362**

Due to the large number of residential units being proposed, a significant impact to public safety is foreseen by implementation of this project. The developer should notify the police, fire service, and emergency medical response organization serving this portion of Kent County, to keep them apprised of all development activities. Portions of this property are located in the Special Flood Hazard Area inundated by the 100-year flood. It appears this area could also experience possible flooding from a category 2 hurricane. Routes 1, 12, and 113A are storm evacuation routes and this development could add traffic volume to these routes during a coastal storm event.

**Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.**

Thank you for the opportunity to review this project. If you have any questions, please contact me at 302-739-3090.

Sincerely,

A handwritten signature in dark ink, appearing to read "Constance C. Holland". The signature is fluid and cursive, with the first name "Constance" being more prominent.

Constance C. Holland, AICP  
Director

CC: Kent County  
Town of Frederica

